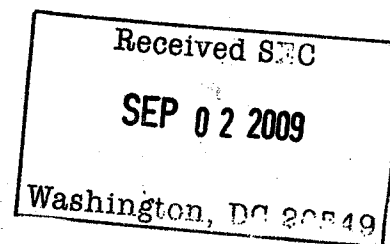


**NASDAQ®**

THE NASDAQ STOCK MARKET  
LISTING QUALIFICATIONS DEPARTMENT  
2500 BLACKWELL BUILDING  
BOSTON, MA 02116

Gary Sundick  
Vice President  
Listing Qualifications



By Facsimile and First Class Mail

September 1, 2009

Ms. Cecile Peters  
Chief, IT Services  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

001-33228  
CERTNAS

Dear Ms. Peters:

This is to certify that on September 1, 2009 The Nasdaq Stock Market (the "Exchange") received from ZION OIL & GAS, INC. (the "Registrant") a copy of the Registrant's application on Form 8-A 12(b) for the registration of the following securities:

Common Stock, \$0.01 par value  
Common Stock Purchase Warrant

We further certify that the securities described above have been approved by the Exchange for listing and registration upon official notice of issuance.

We understand that the Registrant is seeking immediate acceleration of the effective date of registration, and we hereby join in such request.

Sincerely,